| 1 2 3 4 5 6 | RICHARD A. HARRIS, ESQ. Nevada State Bar No. 505 JOSHUA HARRIS, ESQ. Nevada State Bar No. 9580 RICHARD HARRIS LAW FIRM 801 S FOURTH ST. LAS VEGAS NV 89101 Ph: (702) 444-4392 Fax: (702) 444-4455 Email: josh@richardharrislaw.com Attorney for Plaintiff | | |
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| 7 | Auomey for Framum | | |
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| 9 | UNITED STATES DISTRICT COURT | | |
| 10 | DISTRICT OF NEVADA | | |
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| 13 | JENAIL H. NEWTON, Case No. 2:18-cv-00971- GMN-GWF | | |
| 14 15 | Plaintiff, THIRD STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE | | |
| 16 | ws. | | |
| 17 | COMMISSIONER of Social Security | | |
| 18 | Defendant. | | |
| 19 | Comes now Plaintiff by and through her atterney IOSHIIA HAPPIS ESO, and | | |
| 20 | Comes now Plaintiff, by and through her attorney, JOSHUA HARRIS, ESQ., and requests a THIRTY (30) calendar day extension of time, to file the MOTION FOR | | |
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| 22 | REMAND , up to and including December 19, 2018. | | |
| 23 | Plaintiff's current deadline to file the MOTION FOR REMAND is November 19, 2018. | | |
| 24 | The Appellate Attorney Writer had multiple briefs due this week, it is a 3 day work week | | |
| 25 | and the Attorney Writer was ill with debilitating migraines over the past weekend. | | |
| 26 | Via email on November 19, 2018 at 10:42 am, opposing counsel expressed no objection | | |
| 27 | to the extension. | | |
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| 1 | It is therefore respectfully requested that Plaintiff be granted a THIRTY (30) calendar | | |
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| 2 | day extension of time to file the MOTION FOR REMAND up to and including | | |
| 3 | December 19, 2018. | | |
| 4 | | | |
| 5 | DATED this 19 th day of November 2018. | DATED this 19 th day of November 2018. | |
| 6 | s Joshua Acarris | <u> s Tina Kaicker</u> | |
| 7 | JOSHUA HARRIS, ESQ. Nevada State Bar No. 9580 | DAYLE ELIESON United States Attorney | |
| 8 | Richard Harris Law Firm 801 S Fourth St. | District of Nevada TINA NAICKER, CSBN 252766 | |
| 9 | Las Vegas NV 89101 Ph: (702) 444-4392 | Special Assistant United States Attorney 160 Spear Street, Suite 800 | |
| 10 | Fax: (702) 444-4455 | San Francisco, California 94105 | |
| 11 | Email: josh@richardharrislaw.com Attorney for Plaintiff | Telephone: (415) 268-5611 Facsimile: (415) 744-0134 | |
| 12 | | E-Mail: Tina.Naicker@SSA.gov | |
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| 15 | | IT IS SO ORDERED. | |
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| 17 | | Jeorge Foley Jr. | |
| 18 | | United States Magistrate Judge | |
| 19 | | DATED: 11-20-2018 | |
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